

1 Robert A. Spanner, Esq. (State Bar No. 60308)
2 TRIAL & TECHNOLOGY LAW GROUP
3 A Professional Corporation
4 545 Middlefield Road, Suite 220
5 Menlo Park, CA 94025
6 Telephone: (650) 324-2223
7 Facsimile: (650) 324-0178

8 Attorneys for Plaintiff
9 IP SOLUTIONS, INC.

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 IP SOLUTIONS, INC.,) Case No. 07-CV-02774 JF (RS)
15 Plaintiff,)
16 vs.)
17 BANK OF AMERICA, N.A., *et al.*,)
18 Defendants.)
19

20 TO THE COURT, TO ALL PARTIES, AND TO THE PARTIES' ATTORNEYS
21 OF RECORD:

22 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, IP
23 SOLUTIONS, INC. ("Plaintiff") and Defendants, BANK OF AMERICA, N.A. and BANK
24 OF AMERICA TECHNOLOGY AND OPERATIONS, INC. ("Defendants") that the Case
25 Management Conference be continued for one month from its presently-scheduled date of
26 October 26, 2007, until after November 30, 2007, or to a later date that is convenient for
27 the Court.

1 IT IS FURTHER HEREBY STIPULATED AND AGREED by and between
2 Plaintiff and Defendants that, pursuant to this Stipulation continuing the Case Management
3 Conference, the case schedule dates be modified as set forth in Exhibit A, attached hereto.
4 Plaintiff and Defendants desire to pursue settlement opportunities in this matter and have
5 scheduled a mediation for October 22, 2007 utilizing the services of a JAMS mediator.
6

7 This Stipulation is therefore requested for good cause, namely, for the purposes of
8 pursuing opportunities for settlement, and because Defendants' counsel has a trial
9 scheduled to begin the week of November 26, 2007, and is not entered into for purposes of
10 delay. The parties previously stipulated that Defendants be granted an additional fifteen
11 (15) days in which to respond to Plaintiff's Complaint, up to July 27, 2007. The parties
12 further stipulated that Defendants be granted an additional four (4) days in which to
13 respond to Plaintiff's Complaint, up to July 31, 2007. In addition the parties stipulated that
14 the original case management conference be continued for two months, from its originally-
15 scheduled date of August 29, 2007. The Court issued an Order granting that continuance
16 on August 27, 2007.
17

18 By entering into this stipulation, neither Plaintiff nor Defendants waive any rights,
19 claims or defenses they may have in this action. This Stipulation may be executed in
20 counterparts and by facsimile signature, each of which, when executed, shall be an original
21 and all of which together shall constitute one and the same stipulation. This Stipulation
22 contains the entire agreement among the parties. The undersigned hereby consent to the
23
24
25
26
27
28

1 terms set forth in the foregoing Stipulation.

2 IT IS SO STIPULATED AND AGREED.

3
4 Dated: _____

TRIAL & TECHNOLOGY LAW GROUP
A Professional Corporation
Attorneys for Plaintiff
IP SOLUTIONS, INC.

5
6
7 Dated: _____

TRIAL & TECHNOLOGY LAW GROUP
A Professional Corporation
Attorneys for Plaintiff
IP SOLUTIONS, INC.

8
9
10 Dated: _____

FISH & RICHARDSON, P.C.
Attorneys for Defendants
BANK OF AMERICA, N.A. and BANK OF
AMERICA TECHNOLOGY AND OPERATIONS,
INC.

11
12
13 Dated: _____

By: _____
Christina D. Jordan

14
15
16 **DECLARATION OF CONSENT**

17 Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under
18
19 penalty of perjury that concurrence in the filing of this document has been obtained from
20
21 Christina D. Jordan.

Dated: _____

TRIAL & TECHNOLOGY LAW GROUP
A Professional Corporation
Attorneys for Plaintiff
IP SOLUTIONS, INC.

22
23
24 Dated: _____

By: _____
Robert A. Spanner

1 **ORDER**
2
3

4 PURSUANT TO STIPULATION, IT IS SO ORDERED.
5
6

7 Dated: _____
8
9

10 HONORABLE JEREMY FOGEL JUDGE OF THE
11 UNITED STATES DISTRICT COURT
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28